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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:

**MAURICIO ANTONIO REYMUNDO
ASHLEY MOORE REYMUNDO,
Debtors**

§
§
§
§ Case No. 16-32263-SWE-13
§ Chapter 13
§

**ASHLEY MOORE REYMUNDO
v.
THE UNITED STATES DEPARTMENT
OF EDUCATION, et al.**

§
§ Chapter 7
§ Adversary No. 21-03049-SWE
§
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§
§
§

**STIPULATION TO DISMISS DEFENDANTS
UNITED STATES DEPARTMENT OF EDUCATION
AND EDUCATIONAL CREDIT MANAGEMENT CORPORATION**

Plaintiff, Ashley Moore Reymundo (“Plaintiff”), and Defendants United States Department of Education (“US DOE”) and Educational Credit Management Corporation (“ECMC”), by and through their respective attorneys, hereby stipulate as follows:

1. On June 6, 2016, Mauricio and Ashley Reymundo (“Debtors”) filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code.
2. On July 16, 2021, a general discharge Order was entered in the Debtors’ bankruptcy case.

3. On July 18, 2021, Plaintiff filed a Complaint, seeking a discharge of debt pursuant 11 U.S.C. §523(a)(8).
4. On September 1, 2021, the Complaint was amended to add US DOE and ECMC as party defendants.
5. Both US DOE and ECMC are the holders of certain student loans owed by the Plaintiff.
6. Plaintiff no longer wishes to pursue dischargeability of the student loans and desires to terminate this litigation through an agreed dismissal of Defendants US DOE and ECMC.
7. Based on the above, the Plaintiff and Defendants US DOE and ECMC agree and stipulate to the dismissal of US DOE as a Defendant.
8. This stipulation upon approval by the Court will result in a conclusion of this litigation by resolving all claims before the Court in this adversary proceeding.

WHEREFORE, the parties pray this Honorable Court for an Order approving this Stipulation and dismissing US DOE and ECMC as Defendants in this adversary proceeding.

Respectfully Submitted,

/s/ John K. Turner
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CERTIFICATE OF SERVICE

The undersigned certifies that on September 21, 2022, the following parties were served a true copy of the foregoing pleading via first class US Mail.

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